



**California Office**

1303 J Street, Suite 270 | Sacramento, CA 95814 | tel 916.313.5800 | fax 916.313.5812  
[www.defenders.org](http://www.defenders.org)

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**By Email and US Mail**

Cynthia Bryant  
Director, Office of Planning and Research  
Terry Roberts  
State Clearinghouse Director, Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044

**Re: Comments on the January 9, 2009 Preliminary Draft CEQA Guideline  
Amendments for Greenhouse Gas Emissions**

Dear Ms. Bryant and Ms. Roberts:

Thank you for allowing Defenders of Wildlife (“Defenders”) the opportunity to comment on the Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions (“Draft Amendments”). We commend the Office of Planning and Research (“OPR”) for its effort to expand the scope and strength of the CEQA Guidelines in limiting greenhouse gases (“GHGs”) and associated environmental impacts.

Defenders strongly supports OPR’s recognition of forest resources by requiring that lead agencies determine the significance of forest impacts from projects (see Section II of Appendix G). Unfortunately, this requirement is unacceptably limited to forest resources. Indeed, the Draft Guidelines as a whole fail to consider impacts to other important parts of the land base, such as wetlands, grasslands and deserts. These areas provide essential ecosystem services by sequestering carbon dioxide and other GHGs. It is crucial that lead agencies consider impacts to all aspects of the land base from climate change.

According to findings by scientists at the 2008 INTECOL International Wetlands Conference, the world’s wetlands, threatened by development, dehydration and climate change, could release a planet-warming “carbon bomb” if they are destroyed. Wetlands contain 771 billion tons of greenhouse gases, one-fifth of all the carbon on Earth and about the same amount of carbon as is now in the atmosphere. Wetlands account for only 6 percent of Earth’s land surface and store 20 percent of its carbon. The Draft Guidelines should recognize these contributions to carbon sequestration by including impacts to wetlands in Appendix G.

Grasslands are also very important for GHG sequestration. According to one report, the historic loss of soil organic carbon, due to inappropriate land use and soil mismanagement practices, has caused decline in soil quality and emission of carbon into the atmosphere. About 60–70% of this soil organic carbon loss can be resequenced through agricultural intensification based on adoption of recommended agricultural practices. The objective is to adopt land saving

**National Headquarters**

1130 17th Street, N.W.  
Washington, D.C. 20036-4604  
tel 202.682.9400 | fax 202.682.1331

technologies such that marginal lands can be taken out of production for nature conservancy.<sup>1</sup> Scientists have also found that deserts store carbon in soils, plants and decaying matter. California has much arid and semi-arid land, making the State a perfect candidate for a conservation and carbon sequestration strategy in desert areas. It is crucial that the Draft Guidelines include consideration of significant impacts to grasslands and deserts in Appendix G.

Finally, grasslands, wetlands and deserts provide important wildlife habitat in California. Climate change will force wildlife to adapt as these habitats shift, migrate and decrease. The Draft Guidelines should include a requirement that lead agencies consider impacts of climate change on wildlife habitat when determining a project's significant impacts.

Defenders of Wildlife appreciates the opportunity to submit these comments. We strongly support OPR's efforts to develop effective CEQA Guidelines. OPR should incorporate into its Draft Guidelines the exacerbation of climate change from a project's GHGs in addition to impacts to wetlands, grasslands and deserts that provide essential sequestration services and habitat for California's native wildlife. We look forward to seeing the Draft Guidelines amended in a way that balances the need support economic development and the need to mitigate GHG emissions and the effects of climate change on the land base.

Sincerely,



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Joshua Basofin  
California Representative

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<sup>1</sup> Lal, R., 2002. Soil Carbon Dynamics in Cropland and Rangeland. Environmental Pollution 116, 359.